

# Review of the Higher Education Provider Category Standards

## Response from the University of Divinity

The University of Divinity welcomes the invitation to make a submission to the Review of the Higher Education Provider Category Standards (PCS).

### **About the University of Divinity**

For over a century, the University of Divinity has offered awards in divinity and its associated disciplines, defined by the *University of Divinity Act 1910* as ‘studies in religion and ministry practice directly related to Divinity in its contemporary, historical, social and cultural contexts’. Under the Act, the University is accountable to the Victorian Minister for Higher Education. The University promotes the highest standards of learning, teaching and research in theology, philosophy and ministry. Through its scholarship, it aims to address the issues of the contemporary world. The University consists of eleven Colleges located in Melbourne, Adelaide and Sydney. Each College is a unique learning community, supported by a wide range of churches and religious orders that together resource the University as a whole.

### **What characteristics should define a ‘higher education provider’ and a ‘university’ in the PCS?**

Australia has achieved a strong reputation for its higher education sector and quality should continue to be a characteristic of all Australian higher education providers. Their registration and periodic review, against appropriate standards and by a single agency, TEQSA, has been critical to maintaining Australia’s international standing in higher education.

We are of the view that ‘university’ should continue to be a protected term, indicating international standards of teaching and learning, and substantial depth in research leading to the creation of new knowledge. In differentiating the category of university from other higher education providers, we consider that universities should be self-accrediting, deliver undergraduate and postgraduate courses of study including higher degrees by research, and meet robust criteria set for research, scholarship and community engagement, including international outreach. Where comparable programs are offered in Australian universities, they must be of a similar standard, whether offered by public or private or Australian or overseas providers. The title of ‘university’ should carry with it the sense of a long-term and appropriately resourced commitment and a sense of public responsibility to reduce social inequality, advance the university’s communities, progress environmental sustainability and, in other ways, promote the common good.

### **Are the PCS fit for purpose in terms of current and emerging needs? Why?**

In the changing national and global higher education environment, the PCS review is timely. Some perceived higher education trends at the time of the standards’ introduction have not been realised – for example:

- The category of Australian University College seems to be aspirational, rather than reflecting a clear point of difference that universities must embody over against other higher education providers, and has not been operationalised since its introduction;
- To date only one University of Specialisation has been established, the University of Divinity.

This leads us to argue below that there should be only one category of university, thereby removing ambiguity from the university sector and requiring the registration and audit of all Australian universities against the same set of standards. With the increasing global mobility of students, simplifying the categorisation, while ensuring all universities are of high quality, will provide a diverse range of accessible options to both Australian and overseas students seeking to study in Australia. It will also ensure graduates' qualifications are readily recognised and valued in other jurisdictions.

**Should some categories be eliminated or new categories be introduced? What should be the features of any new categories? Do specific categories need to be revised? How?**

In the changing higher education context and a period of significant growth in higher education, revision of the categories is timely and desirable. We argue that there should be two categories of higher education provider – 'universities' and 'other higher education providers', with the elimination of the categories of 'Australian university college' and 'university of specialisation'.

*Universities*

In our view there should only be one category of university with all Australian institutions required to meet comparable criteria to achieve and maintain university status. Within this category, there would be both:

- Australian universities, and
- overseas universities, satisfying requirements to gain approval to operate in Australia and then meeting criteria equivalent to their Australian counterparts.

Within the university category, to ensure a wide range of options for students and to meet the needs of an increasingly diverse Australian community and international demand for Australian higher education, there should be flexibility in regard to the nature, focus and size of the universities. However, an essential characteristic would be meeting national standards at substantial depth in research, scholarship and community engagement as a criterion of the university category. Both applications for university status and TEQSA audits of universities should be against the same accountability and quality standards, irrespective of the entity's number of specialisations or broad fields of study.

*Higher Education Providers*

In the category of non-university higher education providers, two types of institution could potentially be denoted – self-accrediting, recognising those with a proven track record, and non-self-accrediting higher education providers. Within the higher education provider category, there would be both:

- Australian higher education providers, and
- overseas higher education providers, satisfying requirements to gain approval to operate in Australia and then meeting criteria equivalent to their Australian counterparts.

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Significant growth in university enrolments in the last decade has not been matched by the establishment of new universities. While existing universities have had the capacity to increase their student numbers, provision needs to be made in revised PCS for recognition of new greenfield universities in the future, especially in expanding regional areas. Thus, there is a need for specified requirements for greenfield universities as they scale up, including for the graduated development of appropriate 'depth' for being a university. Alternatively, a category for 'new universities' could be included in the PCS.

**How would the needs of providers, students, industry, regulator and broader public interest be served by your suggested changes to the PCS?**

Diversity will be fostered in the Australian tertiary education sector by the revised PCS framework proposed. Defined standards will need to be met by all higher education providers and a more diverse range of institutions in the proposed single university category will also be assessed against defined criteria ensuring substantial depth in research, scholarship and community engagement standards, which universities will be required to meet.

The new PCS, in providing a more intuitively-obvious set of categories, should increase transparency for stakeholders and ensure Australian higher education continues to be of high quality and internationally competitive, whether offered by public or private providers, through large or small institutions, across a range of broad fields or in a more specialised area. There would be a diversification of universities for the diverse categories of students seeking higher education studies.

Finally, the University sees it as important that the PCS review specifies the policy outcomes that are to be assisted by having or retaining different categories of provider. In future, a more unified tertiary education sector in Australia or potentially a single unified sector would be a good way to enhance innovation and diversity.

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It is timely that a review of the Australian Qualifications Framework, to which the University of Divinity will also be making a submission, is being conducted in parallel with the PCS review to optimise the provision of innovative tertiary education to meet the future needs of Australia and increasingly mobile lifelong learners.

The University appreciates the opportunity to contribute to the PCS review and wishes Professor Coaldrake well in completing the task and arriving at recommendations.

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on behalf of the University of Divinity

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